



**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: C.R. BARD, INC. PELVIC REPAIR
SYSTEM PRODCUTS LIABILITY
LITIGATION

MDL NO. 2187

IN RE: AMERICAN MEDICAL SYSTEMS,
INC., PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2325

IN RE: BOSTON SCIENTIFIC, PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION

MDL NO. 2326

IN RE: ETHICON, INC. PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY
LITIGATION

MDL NO. 2327 ✓

IN RE: COLOPLAST PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY
LITIGATION

MDL NO. 2387

IN RE: COOK MEDICAL, INC, PELVIC
REPAIR LIABILITY LITIGATION

MDL NO. 2440

IN RE: NEOMEDIC PELVIC REPAIR SYSTEM
PRODUCT LIABILITY LITIGATION

MDL NO. 2511

THIS DOCUMENT RELATES TO ALL CASES

**LANA C. KEETON
NOTICE OF APPEAL OF DOCKET ENTRY 8580 –and–
ALL RELATED ORDERS DENYING KEETON’S MOTION FOR
RECUSAL OF JUDGE JOSEPH R. GOODWIN IN ALL 7 MDL’S
Pursuant to Rule 60 (b) 3 Relief from a Judgment or Order due to Fraud, Misconduct, etc**

JUDGE JOSEPH R. GOODWIN’s ORDER states that LANA C. KEETON’s MOTION FOR RECUSAL is “entirely without merit”. Judge Goodwin’s statement/denial is a blatant, outrageous, overt lie. Judge Goodwin falsely denies his own guilt in his denial of Lana C.

Keeton's Motion for Judge Goodwin's recusal. Lana C. Keeton's Motion for Recusal is provably true. Judge Goodwin's denial of the truth is a fraud on Lana C. Keeton and a fraud on the court.

"The somewhat sketchy legislative history of section 1503 suggests that a prime focus of the current version section 1503 and of prior iterations was to refine the judicial power to address contempts of court. However, nothing in the legislative history demonstrates that its broad language was not intended to cover allegedly "corrupt" conduct in civil litigation that impedes the "due administration of justice." See *Brogan v. United States*, 118 S. Ct. at 808-09 (***holding that simple denial of guilt came within broad language of statute prohibiting making of false statement***: "We cannot imagine how it could be true that falsely denying guilt in a government investigation does not pervert a governmental function"). In other words, contrary to defendants' argument, section 1503's inconclusive legislative history does not afford an especially compelling basis for constricting the statute's language."

United States of America, Plaintiff, -against- Richard A. Lundwall and Robert W. Ulrich, Defendants. 97 Cr. 0211 (BDP) U. S. Dist Court for the S.D. of N. Y. 1 F. Supp. 2d 249; 1998 U.S. Dist. LEXIS 4466

In other words, Judge Goodwin's simple denial that Keeton's Motion for Recusal is "entirely without merit" under Section 1503 came within the broad language prohibiting making of false statement. Judge Goodwin knowingly made a false statement in a civil litigation making it a criminal action.

Lana C. Keeton has personal knowledge from personal meetings with various individuals, phone conversations, hundreds of e-mail communications, the Docket History of the above named Multidistrict Pelvic Mesh litigations, etc. LANA C. KEETON so swears to this personal knowledge with her signature at the end of this document of the following.

The purpose of Judge Goodwin's overt blatant lie is to maintain total concealment of all monies paid into the approximately \$11 Billion Dollars in settlement monies and the approximately \$550 Million Dollar of Common Benefit Funds. Judge Goodwin created a

criminal enterprise as defined under the RICO statutes which Judge Godwin oversees and manages out of his chambers in the Robert C. Byrd Federal Court House in Charleston, West Virginia. His lie is defined as a predicate act which protects his co-conspirators: attorneys Henry Gilbert Garrard III, Clayton Clark, Joseph Rice, Fred Thompson, Bryan Aylstock, Renee Baggett, Tom Cartmell, Yvonne Flaherty, Carl N. Francovitch, William H. McKee and retired Judge Daniel J. Stack. Judge Goodwin sanctions and protects these officers of the court and others as they steal from Lana C. Keeton through “theft by allocation” of the Common Benefit Funds in the above listed 7 MDL’s.

Non-Lawyer Objector, Pro Se Plaintiff Litigator Lana C. Keeton objected to the massive “**theft by allocation**” sanctioned by the Honorable Judge Joseph R. Goodwin which were then denied by Judge Goodwin through the following:

C.R. Bard MDL 02187 **PTO 308** 07/25/2019

Therefore, the one non-lawyer objection [ECF No. 7161] is **DENIED**.

American Medical Systems MDL 02325 **PTO 283** 07/25/2019

Therefore, the one non-lawyer objection [ECF No. 7297] is **DENIED**.

Boston Scientific MDL 02326 **PTO 212** 07-25-2019

Therefore, the one non-lawyer objection [ECF No. 7940] is **DENIED**.

Ethicon MDL 02327 **PTO 342** 07-25-2019

Therefore, the one non-lawyer objection [ECF No. 7733] is **DENIED**.

Cook Medical MDL 2440 **PTO 89** 07-25-2019

Therefore, the one non-lawyer objection [ECF No. 713] is **DENIED**.

Coloplast MDL 02387 **PTO 161** 07-25-2019

Therefore, the one non-lawyer objection [ECF No. 2402] is **DENIED**.

Neomedic MDL 02511 **PTO 42** 07-25-2019

Therefore, the one non-lawyer objection [ECF No. 220] is **DENIED**.

Judge Goodwin and his named co-conspirators in the criminal enterprise who are officers of the court should be disbarred for their corruption, concealment, conspiracy, collusion in their self-dealing of common benefit monies they have not earned and their fraud on the court and their fraud against Lana C. Keeton.

Dated: September 10, 2020

Respectfully,

Miami Beach, Florida 33139

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via Federal Express this 10th day of September 2020 on all counsel or parties of record by filing it with the Clerk of the Court.

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